

1 KAMALA D. HARRIS
Attorney General of California
2 MARC D. GREENBAUM
Supervising Deputy Attorney General
3 LESLIE A. WALDEN
Deputy Attorney General
4 State Bar No. 196882
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 897-3465
6 Facsimile: (213) 897-2804
Attorneys for Complainant

7
8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Accusation Against:

Case No. 2013-802

11 **NIRUPMA JOY SAMUEL, AKA**
12 **NIRUPMA SINGH, AKA NIRUPMA**
13 **SAMUEL**

A C C U S A T I O N

14 **1412 Halesia Lane**
Oxnard, CA 93030

15 **Registered Nurse License No. 795098**

16 Respondent.

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18 Complainant alleges:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
21 official capacity as the Executive Officer of the Board of Registered Nursing, Department of
22 Consumer Affairs.

23 2. On or about April 1, 2011, the Board of Registered Nursing issued Registered Nurse
24 License Number 795098 to Nirupma Joy Samuel, aka Nirupma Singh, aka Nirupma Samuel
25 (Respondent). The Registered Nurse License was in full force and effect at all times relevant to
26 the charges brought herein and will expire on February 28, 2015, unless renewed.

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1 license, may be a ground for disciplinary action by the respective state licensing board. A
2 certified copy of the record of the disciplinary action taken against the licensee by another state,
3 an agency of the federal government, or another country shall be conclusive evidence of the
4 events related therein.

5 "(b) Nothing in this section shall preclude a board from applying a specific statutory
6 provision in the licensing act administered by that board that provides for discipline based upon a
7 disciplinary action taken against the licensee by another state, an agency of the federal
8 government, or another country."

9 10 **COST RECOVERY**

11 8. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
12 administrative law judge to direct a licentiate found to have committed a violation or violations of
13 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
14 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being
15 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
16 included in a stipulated settlement.

17 18 **CAUSE FOR DISCIPLINE**

19 (Disciplinary Action by Nevada State Board of Nursing)

20 9. Respondent is subject to disciplinary action under section 2761 subdivision (a)(4) in
21 that on or about June 2, 2011, Respondent was subject to discipline through an Agreement for
22 Reprimand by the Nevada State Board of Nursing (NSBN) in the administrative matter entitled
23 *In the Matter of Nirupma Samuel Licensed Professional Nurse, Nevada License No. TRN 329015,*
24 *Case No. 1053-10C.* The Agreement for Reprimand is final and incorporated herein in full. The
25 circumstances are as follows:

26 10. On or about October 5, 2010, Respondent administered intravenous medication to
27 two (2) different patients using the same syringe/vial, left an unlabeled syringe at a patient's
28 bedside, and failed to document a verbal order in violation of Nevada Revised Statutes 632.320

1 (1)(g) (unprofessional conduct), and Nevada Administrative Code 632.890 (27) (failing to
2 perform nursing functions in a manner consistent with established or customary standards).

3 11. The Decision and Order issued by the NSBN ordered as follows:

4 a. Respondent be publicly reprimanded, and
5 b. As a condition of licensure, Respondent shall take and successfully complete
6 the following courses:

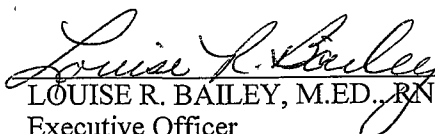
- 7 1. Legal ethics (30 contact hours),
- 8 2. Infection Control (30 contact hours), and
- 9 3. The Nevada Nurse Practice Act web based course.

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11 **PRAYER**

12 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
13 and that following the hearing, the Board of Registered Nursing issue a decision:

- 14 1. Revoking or suspending Registered Nurse License Number 795098, issued to
15 Nirupma Joy Samuel, aka Nirupma Singh, aka Nirupma Samuel;
- 16 2. Ordering Nirupma Joy Samuel to pay the Board of Registered Nursing the reasonable
17 costs of the investigation and enforcement of this case, pursuant to Business and Professions
18 Code section 125.3; and
- 19 3. Taking such other and further action as deemed necessary and proper.

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21 DATED: MARCH 19, 2013


22 LOUISE R. BAILEY, M.ED., RN
23 Executive Officer
24 Board of Registered Nursing
25 Department of Consumer Affairs
26 State of California
27 Complainant
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